

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

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 Federal Communication Commission  
 Bureau / Office

In the Matter of )  
 )  
 Amendment of Section 73 202(b), ) RM-  
 FM Table of Allotments )  
 )  
 (Waldport, Dallas and Monmouth, OR) )  
 To The Chief, Audio Division, Media Bureau

**PETITION FOR RULE MAKING**

Pursuant to Sections 1 401 and 1 420 of the Commission's Rules, Radio Beam, LLC ("Radio Beam"), hereby petitions the Commission to institute a proceeding looking toward amendment of Section 73 202(b), the FM Table of Allotments, as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Waldport, OR	--	253A
Dallas, OR	252C3	236C3
Monmouth, OR	236C3	252C3

As shown in the attached Engineering Statement, Channel 253A can be allotted to Waldport in compliance with all applicable requirements, provided that Channel 236C3 is substituted for vacant Channel 252C3 at Dallas, OR. The allotment of Channel 252C3 to Dallas, in turn, requires that Channel 252C3 be substituted for Channel 236C3 at Monmouth, OR.

In order to prevent a short-spacing to KNRQ(FM), which operates on Channel 250C at Eugene, OR, an allotment site for Channel 253A at Waldport has been identified at NL 44-30-30,

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WL 124-04-07 As shown in the Engineering Statement, principal-city coverage to all of Waldport can be achieved from that site.

To accommodate Channel 236C3 at Dallas, an allotment site has been identified at NL 44-50-43, WL 123-30-07 As shown in the Engineering Statement, principal-city coverage to all of Dallas can be achieved from that site

To accommodate Channel 252C3 at Monmouth, an allotment site has been identified at NL 44-53-08, WL 123-05-36 As shown in the Engineering Statement, principal-city coverage to all of Monmouth can be achieved from that site Radio Beam, the licensee of KSND(FM), which is currently authorized on Channel 236C3 at Monmouth, hereby agrees to the channel change at Monmouth and the concomitant change in reference coordinates. Radio Beam further agrees to file an application for a construction permit to modify its facilities to specify Channel 252C3 at a site that will comply with all applicable requirements.

The proposed amendments to Section 73.202 will serve the public interest. Waldport, an incorporated community with a 2000 U S Census population of 2050 persons, will be provided with a second local aural service and a first FM service <sup>1</sup> Moreover, as shown in the Engineering Statement, the proposals in the aggregate will provide new service to 254,812 persons, and the entire "loss area" will continue to receive at least five aural services

For the reasons stated, it is respectfully requested that the Commission issue a Notice of Proposed Rule Making proposing the amendments to Section 73 202(b) described above. Radio Beam represents that if Channel 253A is allotted to Waldport, Oregon, Radio Beam will file an

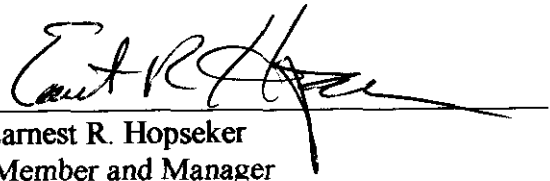
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<sup>1</sup> The Commission has already determined that Waldport meets the requirements for a "community," since AM station KORC is licensed to Waldport

application for a construction permit for that channel, and, if its application is granted, will  
timely construct a facility on such channel

Respectfully submitted,

RADIO BEAM, LLC

By   
\_\_\_\_\_  
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Dated: December 4, 2003

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## **ENGINEERING STATEMENT**

**PETITION FOR RULEMAKING TO  
AMEND SECTION 73.202 OF THE RULES  
AND REGULATIONS FOR THE FEDERAL  
COMMUNICATIONS COMMISSION**

**TO ASSIGN FM CHANNEL 253A  
FOR USE AT WALDPORT, OREGON**

**TO ASSIGN FM CHANNEL 236C3  
FOR USE AT DALLAS, OREGON**

**TO ASSIGN FM CHANNEL 252C3  
FOR USE AT MONMOUTH, OREGON**

**RADIO BEAM, LLC**

**11/2003**

## **Engineering Statement**

This Engineering Statement has been prepared on behalf of Radio Beam, LLC ("Radio Beam"), in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to:

- 1) Assign Channel 253A for use at Waldport, Oregon,
- 2) Substitute Channel 236C3 for vacant Channel 252C3 at Dallas, Oregon, and;
- 3) Substitute Channel 252C3 for Channel 236C3 at Monmouth, Oregon, for use by FM station KSND.

The proposed reallocation plan will provide several benefits:

- 1) Waldport, an incorporated city with a 2000 Census population of 2,050 persons, will receive its second local service and its first local FM service
- 2) A total of 254,812 persons will receive an additional aural service.
- 3) In accommodating the benefits listed above, no white, gray, or underserved areas will be created.

### **Channel 253A at Waldport**

As outlined in the attached channel study, Channel 253A can be assigned for use at Waldport in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 236C3 is substituted for the vacant

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Channel 252C3 allotment at Dallas. In order to prevent a short-spacing to KNRQ Channel 250C Eugene, an allotment site has been identified at NL 44° 30' 30" x WL 124° 04' 07". This site is 12.4 kilometers from the most distant point of the City of Waldport. The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Waldport.

The allotment of Channel 253A at Waldport will provide 60 dBu service to 26,636 persons in a 1,286 km<sup>2</sup> land area. (A portion of the 60 dBu service area falls over the Pacific Ocean.)

#### **Channel 236C3 at Dallas**

As outlined in the attached channel study, Channel 236C3 can be assigned for use at Dallas in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 252C3 is substituted for Channel 236C3 at Monmouth for use by KSND. Channel 236C3 does not fit at the existing Dallas Channel 236C3 allotment site, but an allotment site has been identified at NL 44° 50' 43" x WL 123° 30' 07". This site is 20.0 kilometers from the most distant point of the City of Dallas. The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Dallas.

#### **Channel 252C3 at Monmouth**

As outlined in the attached channel study, Channel 252C3 can be assigned for use at Monmouth by KSND in compliance with the Commission's applicable Rules and Regulations.

regarding the separation among FM allotments, assuming that Channel 236C3 is substituted for vacant Channel 252C3 at Dallas. Channel 252C3 does not fit at the existing KSND Channel 252C3 allotment site, but an allotment site has been identified at NL 44° 53' 08" x WL 123° 05' 36". This site is 13.0 kilometers from the most distant point of the City of Monmouth. The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Monmouth.

### **Gain and Loss Areas**

There is overlap among the 60 dBu service areas of all the existing and proposed allotments, and portions of those service areas fall at sea. The attached map titled "Gain and Loss Areas" depicts the 60 dBu service areas, and is annotated to indicate the number of services lost and gained in each area as a result of the proposed reallocation plan. The gain and loss areas are summarized in the table below:

**Table of Gain and Loss Areas**

	<b>Population and Area</b>
Loss Area	19,488 persons in 1,813 km <sup>2</sup> land area
Gain Area	254,812 persons in 3,313 km <sup>2</sup> land area

The proposed reallocation plan will not result in the creation of any white, gray, or underserved areas.<sup>1</sup> The attached "Loss Area Study" exhibit depicts the 60 dBu service contours of a subset of the numerous stations which provide service to the loss area. The contours shown are sufficient to demonstrate that the entire loss area will continue to be well-served, with five or more aural services remaining. The stations whose contours are shown are:

KGON-FM	222C	Portland
KPDQ-FM	229C	Portland
KXJM-FM	238C	Portland
KCRF-FM	244C1	Lincoln City
KKSN-FM	246C	Portland
KSHL-FM	248C2	Gleneden Beach
KRKT-FM	260C0	Albany
KKRZ-FM	262C	Portland
KPPT-FM	264C2	Depoe Bay
KUFO-FM	266C	Portland
KINK-FM	270C	Portland
KYTE-FM	274C1	Newport
KKCW-FM	277C	Portland
KLOO-FM	292C	Corvallis
KLTH-FM	294C	Portland
KHPE-FM	300C	Albany

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<sup>1</sup>In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour. See Meeker and Craig, Colorado, 15 FCC Rcd 23858 (2000), Stamps and Fouke, Arkansas, 14 FCC Rcd 10533 (1999), Silverton and Bayfield, Colorado, 14 FCC Rcd 4071 (1999), Malvern and Bryant, Arkansas, 13 FCC Rcd 8426 (1998), and others.



Additional service to the loss area is provided by numerous non-commercial and commercial AM and FM stations. A list of those stations can be provided should the Commission so require.

SEARCH PARAMETERS

FM Database Date: 031105

Channel: 253A 98.5 MHz  
 Latitude: 44 30 6  
 Longitude: 124 4 30  
 Safety Zone: 32 km  
 Job Title: WALDPORT 253A

Call Status	City St	FCC File No	Channel Freq	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KNRQ-FM LIC	EUGENE OR	BLH-910528KF	250C 97.9	100.000 308.0	44-00-08 123-06-50	125.6	94.72 -0.28	95 SHORT
VAC NOTE	DALLAS OR - TO CHANGE TO	236C3	252C3 98.3	0.000 0.0	44-55-06 123-19-00	52.0	75.86 -13.14	89 SHORT
NEW-T APP	DEPOE BAY OR	BNPFT-030317HWJ	252D 98.3	0.030 350.0	44-45-24 124-02-50	4.4	28.42 0.00	0 TRANS
NEW-T APP	DEPOE BAY OR	BNPFT-030827APV	252D 98.3	0.030 329.0	44-45-24 124-02-53	4.3	28.42 0.00	0 TRANS
K252DL LIC	WALTON OR	BLFT-020619AAS	252D 98.3	0.010 580.0	44-04-00 123-37-42	143.5	60.06 0.00	0 TRANS
ADD	BEND OR	RM-10684	253C1 98.5	0.000 0.0	44-04-41 121-19-57	101.2	223.90 23.90	200 CLEAR
NEW APP	EUGENE OR	BNPL-010615ALN	253L1 98.5	0.030 51.5	44-04-18 123-08-01	122.2	89.05 0.00	0 LPFM
NEW-T APP	YACHATS OR	BNPFT-030313BHF	253D 98.5	0.250 95.0	44-26-33 124-04-16	177.3	6.58 0.00	0 TRANS
NEW-T APP	YACHATS OR	BNPFT-030826ALB	253D 98.5	0.250 95.0	44-26-33 124-04-16	177.3	6.58 0.00	0 TRANS
KYTT-FM LIC	COOS BAY OR	BLH-950309KD	254C2 98.7	13.000 293.0	43-27-49 124-05-44	180.8	115.35 9.35	106 CLOSE
KWPB-LP LIC	NEWPORT OR	BLL-030428AAK	254L1 98.7	0.050 41.9	44-38-45 124-03-14	5.9	16.11 0.00	0 LPFM
KUPLaux LIC	PORTLAND OR	BXMLH-000316ABX	254C1 98.7	16.000 337.0	45-27-13 122-32-45	48.1	160.44 0.00	0 AUX
KUPL-FM LIC	PORTLAND OR	BLH-970915KD	254C1 98.7	37.000 440.0	45-30-58 122-43-59	42.6	154.60 21.60	133 CLEAR
KUPLaux CP	PORTLAND OR	BXPB-970219ID	254C1 98.7	37.000 362.0	45-30-57 122-43-52	42.7	154.69 0.00	0 AUX

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SEARCH PARAMETERS

FM Database Date: 031105

Channel. 253A 98.5 MHz  
 Latitude. 44 30 6  
 Longitude: 124 4 30  
 Safety Zone. 32 km  
 Job Title. WALDPORT 253A

Page 2

Call	City	Channel	ERP(kW)	Latitude	Bearing	Dist	Req
Status	St	FCC File No	Freq. HAAT(m)	Longitude	deg-True	(km)	(km)
KODZ	EUGENE	256C	100.000	44-06-56	116.3	95.99	95
LIC	OR	BLH-840409BY	99.1 497.0	122-59-56		0.99	CLOSE

44444 BEGINNING SEARCH OF SECONDARY DATABASE 44444

KSND	MONMOUTH	252C3	0 000	44-53-08	60.8	88.74	89
PROP	OR -	98.3	0.0	123-05-36		-0 26	SHORT
None	WALDPORT	253A	0.000	44-30-06	0.0	0 00	115
PROP	OR -	98.5	0 0	124-04-30		-115.00	SHORT

44444 END OF FM SPACING STUDY FOR CHANNEL 253 44444

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## SEARCH PARAMETERS

FM Database Date. 031105

Channel: 236C3 95 1 MHz Page 1  
 Latitude: 44 50 43  
 Longitude 123 30 7  
 Safety Zone: 32 km  
 Job Title. DALLAS 236C3

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KMGE LIC	EUGENE OR	BLH-970925KE	233C1 94.5	49.000 396.0	44-00-04 123-06-45	161.6	98.80 22.80	76 CLEAR
NEW-T APP	SALEM OR	BNPFT-030317MBL	233D 94.5	0.250 DA 58.0	44-58-57 123-00-17	68.5	42.12 0.00	0 TRANS
KPIE-LP LIC	DALLAS OR	BLL-020923AAJ	234L1 94.7	0.100 19.2	44-52-54 123-24-06	62.9	8.90 0.00	0 LPFM
NEW-T APP	BETHEL OR	BNPFT-030317MTX	235D 94.9	0.020 320.0	44-00-08 123-06-50	161.7	98.65 0.00	0 TRANS
NEW-T APP	BETHEL OR	BNPFT-030815AAA	235D 94.9	0.020 315.0	44-00-08 123-06-50	161.7	98.65 0.00	0 TRANS
KCBZ CP MOD	CANNON BEACH OR	BMPH-010208AAV	235C3 94.9	1.700 378.0	45-57-27 123-50-01	348.3 SS	126.31 27.31	99 CLEAR
KCBZ CP	CANNON BEACH OR	BPH-020227ACX	235C3 94.9	16.000 107.0	45-56-44 123-57-04	344.2 SS	127.24 28.24	99 CLEAR
KRAD-LP CP	MILLERSBURG OR	BNPL-010615BDY	235L1 94.9	0.010 78.8	44-39-03 123-00-59	119.2	44.11 0.00	0 LPFM
NEW-T APP	ALOHA OR	BNPFT-030310AZW	236D 95.1	0.020 355.0	45-29-20 122-41-40	41.2	95.64 0.00	0 TRANS
NEW-T APP	BETHANY OR	BNPFT-030310BHI	236D 95.1	0.020 0.0	45-31-23 122-45-07	37.7	95.65 0.00	0 TRANS
KSND-1 APP	DEPOE BAY OR	BNPFTB-030724ABL	236D 95.1	0.300 DA 0.0	44-45-24 124-02-53	257.3	44.32 0.00	0 BOOST
NEW-T APP	INDEPENDENCE OR	BNPFT-030310ASJ	236D 95.1	0.020 DA 342.0	44-58-59 123-08-39	61.3	32.13 0.00	0 TRANS
KSND LIC NOTE	LINCOLN CITY OR	BLH-950403KE	236C2 95.1	6.000 258.0	44-45-24 124-02-53	257.3 SS	44.32 -132.68	177 SHORT
	KSND TO 252C3 PER THIS PROPOSAL							
KSND CP NOTE	MONMOUTH OR	BPH-030729AFK	236C3 95.1	1.000 477.0	44-53-19 123-36-26	300.2	9.61 -143.39	153 SHORT
	KSND TO 252C3 PER THIS PROPOSAL							

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SEARCH PARAMETERS

FM Database Date 031105

Channel: 236C3 95.1 MHz  
 Latitude: 44 50 43  
 Longitude: 123 30 7  
 Safety Zone: 32 km  
 Job Title: DALLAS 236C3

Page 2

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KLTW-FM	PRINEVILLE		236C1	100.000	44-18-32	105.4	212.82	211
LIC	OR	BLH-850916KA	95.1	144.0	120-55-47		1.82	CLOSE
KUJZ	CRESWELL		237C3	0.630	44-00-04	161.6	98.80	99
LIC	OR	BLH-920331KC	95.3	368.0	123-06-45	SS	-0.20	SHORT
K269DH	FLORENCE, ETC.		237D	0.030 DA	43-57-26	204.9	108.69	0
APP	OR	BMJPFT-030829AWI	95.3	256.0	124-04-26		0.00	TRANS
K269DH	FLORENCE, ETC.		237D	0.030 DA	43-57-26	204.9	108.69	0
APP	OR	BMJPFT-030314BOA	95.3	256.0	124-04-26		0.00	TRANS
KXJMaux	PORTLAND		238C	40.000	45-29-20	41.2	95.64	0
LIC	OR	BLH-981023KC	95.5	309.0	122-41-40		0.00	AUX
KXJM	PORTLAND		238C	100.000	45-29-20	41.2	95.64	96
LIC	OR	BLH-980901KC	95.5	386.0	122-41-40		-0.36	SHORT
NEW-T	FLYNN		239D	0.080	44-33-56	156.8	33.82	0
APP	OR	BNPFT-030317MFR	95.7	180.0	123-20-02		0.00	TRANS
NEW-T	NEWPORT		239D	0.100	44-38-12	240.9	47.59	0
APP	OR	BNPFT-030317DZX	95.7	152.0	124-01-36		0.00	TRANS
44444 BEGINNING SEARCH OF SECONDARY DATABASE 44444								
None	DALLAS		236C3	0.000	44-50-43	0.0	0.00	153
PROP	OR	-	95.1	0.0	123-30-07		-153.00	SHORT
44444 END OF FM SPACING STUDY FOR CHANNEL 236 44444								

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SEARCH PARAMETERS FM Database Date: 031105  
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Channel 252C3 98.3 MHz  
Latitude 44 53 8  
Longitude 123 5 36  
Safety Zone: 32 km  
Job Title: MONMOUTH 252C3

Call Status	City St	FCC File No	Channel Freq	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K249DK LIC	NEWBERG OR	BLFT-980617TH	249D 97.7	0.010 431.0	45-21-17 122-59-23	8 8	52.77 0.00	0 TRANS
NEW-T APP	SALEM OR	BNPFT-030317IBK	249D 97.7	0.020 320.0	44-51-18 123-07-15	212.5	4.03 0.00	0 TRANS
KNRQ-FM LIC	EUGENE OR	BLH-910528KF	250C 97.9	100.000 308.0	44-00-08 123-06-50	181 0	98.17 2.17	96 CLOSE
NEW-T APP	SILVERTON OR	BNPFT-030317AQY	250D 97.9	0.250 DA 366.0	45-00-00 122-41-37	67.8	34.02 0.00	0 TRANS
NEW-T APP	BEAVERTON OR	BNPFT-030317AHR	251D 98.1	0.010 710.0	45-31-21 122-44-45	20 9	75.87 0.00	0 TRANS
ADD	BRIGHTWOOD OR	RM-9870	251C3 98.1	0.000 0.0	45-17-20 121-47-04	66.0	112.37 13.37	99 CLEAR
DEL	BEND OR	RM-9961	252C3 98.3	0.000 0.0	44-04-41 121-19-57	122 1	166.36 13.36	153 CLEAR
KTWS LIC	BEND OR	BLH-950629KC	252C3 98.3	6.800 191.0	44-04-41 121-19-57	122.1	166.36 13.36	153 CLEAR
VAC NOTE	DALLAS OR -	TO CHANGE TO 236C3 PER THIS PROPOSAL	252C3 98.3	0.000 0 0	44-55-06 123-19-00	281.8	18.01 -134.99	153 SHORT
NEW-T APP	DEPOE BAY OR	BNPFT-030317HWJ	252D 98.3	0.030 350.0	44-45-24 124-02-50	259.6	76.79 0.00	0 TRANS
NEW-T APP	DEPOE BAY OR	BNPFT-030827APV	252D 98.3	0.030 329.0	44-45-24 124-02-53	259.6	76.86 0.00	0 TRANS
VAC	RAINIER OR -		252A 98.3	0.000 0 0	46-10-18 122-57-42	4.1	143.31 1.31	142 CLOSE
NEW-T APP	ROCKFORD OR	BNPFT-030317EDV	252D 98.3	0.250 116 0	45-42-07 121-32-10	52.8	152.17 0.00	0 TRANS
NEW-T APP	ROCKFORD OR	BNPFT-030825AIY	252D 98.3	0.250 121.0	45-42-07 121-32-10	52 8	152.17 0.00	0 TRANS

Hatfield & Dawson Consulting Engineers

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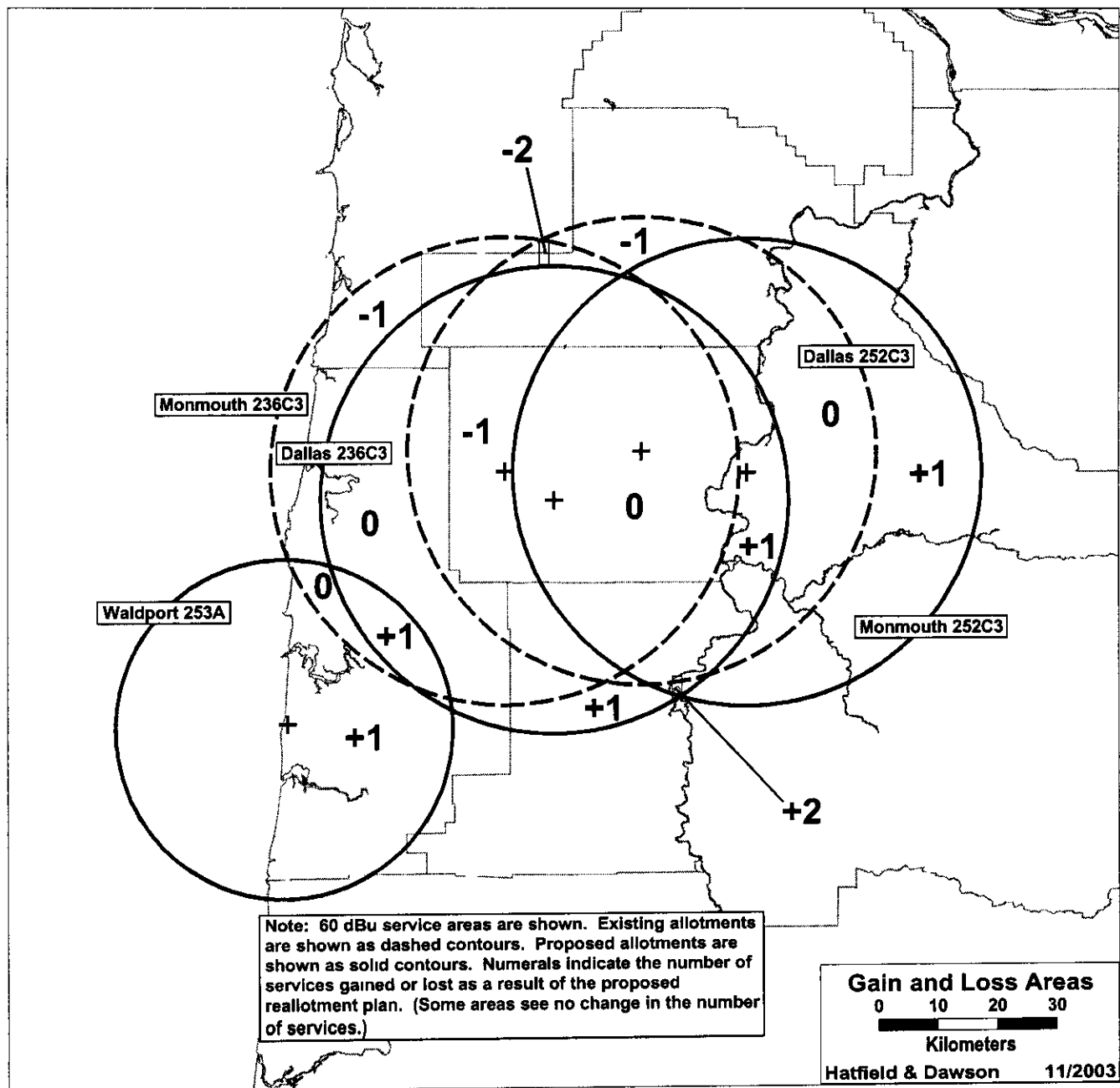
SEARCH PARAMETERS

FM Database Date: 031105

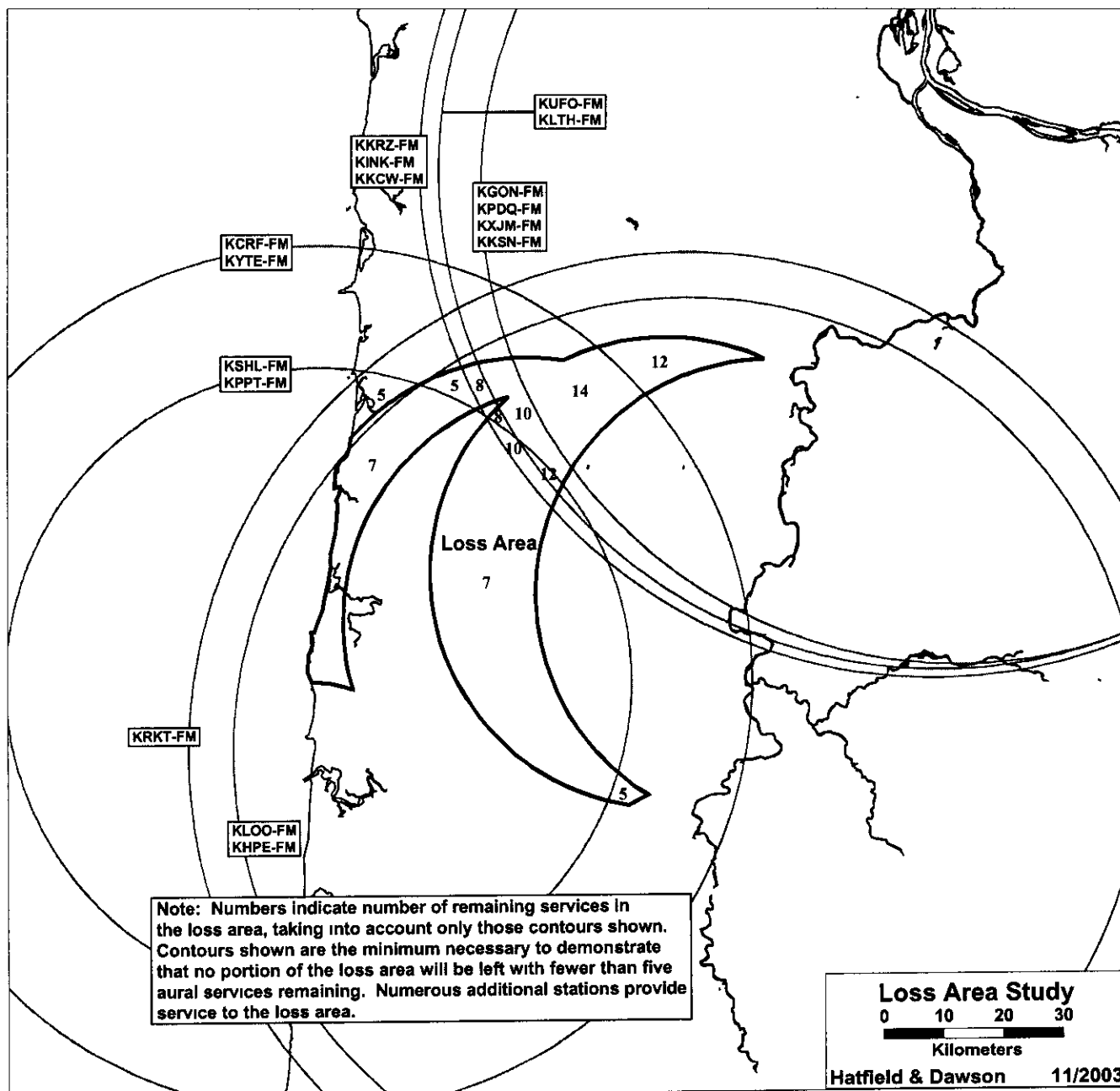
Channel 252C3 98.3 MHz  
 Latitude 44 53 8  
 Longitude 123 5 36  
 Safety Zone: 32 km  
 Job Title: MONMOUTH 252C3  
 Page 2

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K252DL LIC	WALTON OR	BLFT-020619AAS	252D 98.3	0.010 580.0	44-04-00 123-37-42	205 2	100.46 0.00	0 TRANS
NEW-T APP	LONGVIEW WA	BNPFT-030317KJM	252D 98.3	0.020 346.0	46-02-58 122-55-07	5 9	130.07 0.00	0 TRANS
NEW-T APP	LONGVIEW WA	BNPFT-030826ABM	252D 98 3	0.020 DA 335.0	46-02-59 122-55-10	5 9	130.10 0 00	0 TRANS
ADD	BEND OR	RM-10684	253C1 98 5	0.000 0.0	44-04-41 121-19-57	122.1	166.36 22.36	144 CLEAR
NEW APP	EUGENE OR	BNPL-010615ALN	253L1 98.5	0 030 51.5	44-04-18 123-08-01	182.0	90.50 23.50	67 CLEAR
NEW-T APP	YACHATS OR	BNPFT-030313BHF	253D 98.5	0.250 95 0	44-26-33 124-04-16	237.8	91.86 0.00	0 TRANS
NEW-T APP	YACHATS OR	BNPFT-030826ALB	253D 98.5	0 250 95 0	44-26-33 124-04-16	237.8	91.86 0.00	0 TRANS
KUPLaux LIC	PORTLAND OR	BXMLH-000316ABX	254C1 98.7	16.000 337.0	45-27-13 122-32-45	34.0	76.41 0.00	0 AUX
KUPL-FM LIC	PORTLAND OR	BLH-970915KD	254C1 98 7	37.000 440.0	45-30-58 122-43-59	21.8	75.58 -0.42	76 SHORT
KUPLaux CP	PORTLAND OR	BXPH-970219ID	254C1 98.7	37.000 362.0	45-30-57 122-43-52	21 9	75.61 0 00	0 AUX
44444 BEGINNING SEARCH OF SECONDARY DATABASE						44444		
KSND PROP	MONMOUTH OR	-	252C3 98.3	0 000 0 0	44-53-08 123-05-36	0.0	0.00 -153.00	153 SHORT
None PROP	WALDPORT OR	-	253A 98.5	0.000 0.0	44-30-06 124-04-30	241 5	88.74 -0 26	89 SHORT

44444 END OF FM SPACING STUDY FOR CHANNEL 252 44444



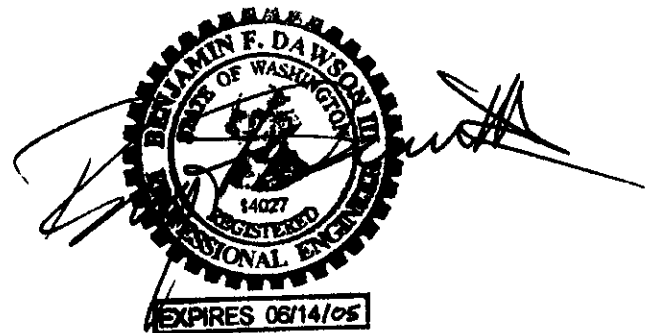




**Statement of Engineer**

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Dallas, Monmouth, and Waldport, Oregon, has been prepared by Erik C. Swanson, EIT, under my direct supervision. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 17<sup>th</sup> day of November, 2003



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers